

VINOD NICHANI – SB#277607  
NICHANI LAW FIRM  
1250 Oakmead Pkwy., #210  
Sunnyvale, California 94085  
Phone: 408-800-6174  
Fax: 408-290-9802  
Email: vinod@nichanilawfirm.com

(Proposed) Attorney for Debtor-in-Possession  
VICTOR BATINOVICH

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In Re:	) Case No.: 17-52444
	)
	) CHAPTER 11
VICTOR BATINOVICH	)
	) MOTION TO CONTINUE STATUS
	) CONFERENCE
Debtor-in-Possession	)
	)
	) <u>Hearing</u>
	) Date: December 7, 2017
	) Time: 10:00 a.m.
	) Ctrm: 3099
	)
	) Judge: Honorable Stephen L. Johnson
	)

1. On October 5, 2017 (the “Petition Date”), the Debtor in Possession (the “Debtor”) filed a voluntary Chapter 11 bankruptcy.
2. The Debtor continues to manage its affairs as a Debtor-in-Possession pursuant to sections 1107(a) of the Bankruptcy Code.
3. On or about October 6, 2017 (Docket # 6), the court filed a Notice of Status Conference in Chapter 11.

- 1 4. On or about November 27, 2017, the Debtor filed a Motion to Dismiss Chapter 11. An  
2 Amended Notice scheduled the hearing on the Motion to Dismiss for January 10, 2018.  
3  
4 5. On or about November 30, 2017, the Debtor filed its Status Conference Statement in  
5 advance of the above hearing.  
6  
7 6. Debtor requests the status conference be continued to the same date and time as the  
8 Motion to Dismiss for purposes of judicial economy. A status conference on the same  
9 date as the hearing would save time for the debtor and the court.

10 WHEREFORE, Debtor respectfully requests the status conference be continued to January 10,  
11 2018 at 10:30 a.m.  
12

13 Dated: December 5, 2017

NICHANI LAW FIRM

16 /s/ Vinod Nichani  
17 VINOD NICHANI  
18 (Proposed) Attorney for  
19 Debtor-in Possession  
20 VICTOR BATINOVICH  
21  
22  
23  
24  
25  
26  
27  
28